

**U.S. ENVIRONMENTAL PROTECTION AGENCY
REGION IV**

POLREP #2

Date: July 28, 2004

From: Robert N. Rosen
On-Scene Coordinator
USEPA Region IV

To: Regional Response Center
EPA HQ Regional Coordinator

I. GENERAL SITE INFORMATION

Site Name: Constitution Road Drum Site
Street address: 1235 Constitution Road
City, county, state, zip code: Atlanta, Dekalb County, Georgia 30316
NPL Status: non-NPL
Incident Category: emergency response
Status of Action Memorandum(a): operating under OSC \$250,000 authority
Start Date: July 9, 2004
Completion Date: July 31, 2005

II. BACKGROUND INFORMATION

See initial action memo/polrep

III. RESPONSE INFORMATION

- A. **Actions Taken:** ERRS contractors continue the slow process of extricating drums and totes from the vast pile of containers and restaging them in designated areas. This process will take approximately 3 more months to complete. START contractors have begun the process of logging information from each drum into a database. This includes a description of the type of drum, labels, markings, or other information that could potentially be useful for both tracking and PRP purposes. Digital photos of all drum markings are also being taken. Last week, START obtained samples from the two tanker trailers and two sludge boxes. These samples were sent off for waste disposal analysis and results should be available soon. One tanker had 4' of liquid inside (approximately 3,000 gallons); the other had less than 1,000 gallons. Both sludge boxes were full.

When EPA initiated actions at the site, there were 12 semi-trailers on site. Of these, 3 were empty and 9 were full of drums and totes. One trailer belonged to the former operator, Southeastern Research and Recovery, and is now being used to stage

empty drums. The other trailers had been leased. Nine trailers have now been removed from the site by the leasing company after being emptied (where necessary) and cleaned. Only two trailers remain on site and both are full of containers. These will be emptied within the next week and picked up by the leasing company.

Site security is now being provided for evenings and weekends.

- B. **Use of Innovative Technologies or Authorities:** None to date
- C. **Community Involvement:** None to date aside from several articles in the local tabloid, Creative Loafing.
- D. **Unusual Circumstances:** None, other than lots of drums.
- E. **Future Considerations:** EPA Regional Counsel and the Cost Recovery program are investigating site ownership and reviewing manifests in order to develop a PRP list. It is our hope that by the time the site has been stabilized, we will be able to turn the site over to a PRP group for completion of the removal action.
- F. **Post Removal Site Control:** This issue will be addressed much later in the removal action and/or by the PRP group.

IV. CONTRACTOR INFORMATION AND ESTIMATED COSTS

- A. **Contractor Information:** EPA is utilizing ERRS and START contractors for this removal action.

- B. **Estimated Costs:**

	<u>Costs to Date</u>	<u>Ceiling</u>
START	\$ 26,500	\$ 40,000
ERRS	\$ 72,340	\$ 200,000
Total Estimated Extramural	\$ 98,840	\$ 240,000

V. DISPOSITION OF WASTES

No wastes generated or disposed of during this action.

VI. ROSTER OF AGENCIES/ORGANIZATIONS ASSISTING IN REMOVAL

This information will be provided with the next Polrep

VII. LESSONS LEARNED

No significant lessons.

**U.S. ENVIRONMENTAL PROTECTION AGENCY
REGION IV**

POLREP #3

Date: August 17, 2004

From: Robert N. Rosen
On-Scene Coordinator
USEPA Region IV

To: Regional Response Center
EPA HQ Regional Coordinator

I. GENERAL SITE INFORMATION

Site Name: Constitution Road Drum Site
Street address: 1235 Constitution Road
City, county, state, zip code: Atlanta, Dekalb County, Georgia 30316
NPL Status: non-NPL
Incident Category: emergency response
Status of Action Memorandum(a): ceiling increase action memo signed 8/16/2004
Start Date: July 9, 2004
Completion Date: July 31, 2005

II. BACKGROUND INFORMATION

See initial action memo/polrep

III. RESPONSE INFORMATION

- A. **Actions Taken:** ERRS contractors continue the slow process of extricating drums and totes from the vast pile of containers and restaging them in designated areas. This process will take approximately 2 more months to complete. START contractors have begun the process of logging information from each drum and tote into a database. This includes a description of the type of container, labels, markings, or other information that could potentially be useful for both tracking and PRP purposes. Digital photos of all container markings are also being taken. Two weeks ago, START obtained samples from the two tanker trailers and two sludge boxes. These samples were sent off for waste disposal analysis and results have now been evaluated. Bid responses for transportation and disposal are under \$20,000 and ERRS will move ahead with T&D.

The ceiling increase action memo has been signed and additional monies will be put into the START TDD and ERRS Task Order. ERRS work was not impacted during the slight delay in receiving ceiling increase approval but, START had to bring their

activities to a near-halt. They will resume the process of logging drums. START is also evaluating the benefit of networking laptops with a desktop computer which is already located at the site. By creating a network, team members can log drum data directly onto laptops while walking the rows of drums, then download this information to the desktop computer via the network system. In addition, START is obtaining estimates for the cost of making this a web-based system. ERRS and START are evaluating various alternatives for hand-sampling of drums as well as hand-hazcatting.

The current estimate of containers on site is now approximately 10,000 drums and 1,000 totes.

- B. **Use of Innovative Technologies or Authorities:** None used to date but START and ERRS are evaluating various sampling and analytical tools to reduce time involved in container logging, sampling and hazcatting.
- C. **Community Involvement:** None to date aside from several articles in the local tabloid, Creative Loafing.
- D. **Unusual Circumstances:** None, other than lots of drums.
- E. **Future Considerations:** EPA Regional Counsel and the Cost Recovery program are investigating site ownership and reviewing manifests in order to develop a PRP list. It is our hope that by the time the site has been stabilized, we will be able to turn the site over to a PRP group for completion of the removal action.
- F. **Post Removal Site Control:** This issue will be addressed much later in the removal action and/or by the PRP group.

IV. CONTRACTOR INFORMATION AND ESTIMATED COSTS

- A. **Contractor Information:** EPA is utilizing ERRS and START contractors for this removal action.
- B. **Estimated Costs:**

	<u>Costs to Date</u>	<u>Ceiling</u>	<u>Increased to</u>
START	\$ 43,292	\$ 50,000	\$ 350,000
ERRS	\$ 148,340	\$ 200,000	\$ 800,000
Total Estimated Extramural	\$ 191,632	\$ 250,000	\$1,150,000

V. DISPOSITION OF WASTES

No wastes generated or disposed of during this action.

VI. ROSTER OF AGENCIES/ORGANIZATIONS ASSISTING IN REMOVAL

This information will be provided in the next Polrep

VII. LESSONS LEARNED

Don't abandon large numbers of drums and totes.

**U.S. ENVIRONMENTAL PROTECTION AGENCY
REGION IV**

POLREP #4

Date: September 2, 2004

From: Robert N. Rosen
On-Scene Coordinator
USEPA Region IV

To: Regional Response Center
EPA HQ Regional Coordinator

I. GENERAL SITE INFORMATION

Site Name: Constitution Road Drum Site
Street address: 1235 Constitution Road
City, county, state, zip code: Atlanta, Dekalb County, Georgia 30316
NPL Status: non-NPL
Incident Category: emergency response
Status of Action Memorandum(a): ceiling increase action memo signed 8/16/2004
Start Date: July 9, 2004
Completion Date: July 31, 2005

II. BACKGROUND INFORMATION

See initial action memo/polrep

III. RESPONSE INFORMATION

- A. **Actions Taken:** ERRS contractors have now cleared drums and totes from all piles located on the ground and are now working on clearing the loading dock. All staging should be completed within the next 3 weeks. START contractors continue the laborious process of logging drum labels and photos into a tracking database. The information logged into the system includes a description of the type of container, labels, markings, or other information that could potentially be useful for both tracking and PRP purposes. At present, 2 teams of 2 people are logging drums directly onto laptop computers. Every afternoon, the information on the laptops is downloaded onto the site mainframe. Additional START members are working on entering backlogged data. Barring weather delays or loss of personnel to hurricane response, it will take approximately 7 more weeks to complete the logging.

Both sludge boxes have now been shipped off-site for disposal in landfills as non-hazardous waste. A vacuum truck has also retrieved the contents of the 2 tankers that

had been left at the site. Their contents have also been disposed of and the owner of the tankers has removed them from the site, freeing up additional room for drum and tote staging.

- B. **Use of Innovative Technologies or Authorities:** None used to date but START and ERRS are evaluating various sampling and analytical tools to reduce time involved in container logging, sampling and hazcatting. On September 14, a vendor will demonstrate a device which remotely opens drums, performs headspace analysis, obtains a sample for hazcatting, and then leaves the drum with a synthetic membrane seal over the sample perforation. If this instrument works as advertised, it could reduce sampling time dramatically since staff would be able to sample in level D instead of level B.
- C. **Community Involvement:** None to date aside from several articles in the local tabloid, Creative Loafing.
- D. **Unusual Circumstances:** None, other than lots of drums.
- E. **Future Considerations:** EPA Regional Counsel and the Cost Recovery program are investigating site ownership and reviewing manifests in order to develop a PRP list. It is our hope that by the time the site has been stabilized, we will be able to turn the site over to a PRP group for completion of the removal action.
- F. **Post Removal Site Control:** This issue will be addressed much later in the removal action and/or by the PRP group.

IV. CONTRACTOR INFORMATION AND ESTIMATED COSTS

- A. **Contractor Information:** EPA is utilizing ERRS and START contractors for this removal action.
- B. **Estimated Costs:**

	<u>Costs to Date</u>	<u>Current Ceiling</u>
START	\$ 69,312	\$ 250,000
ERRS	<u>\$ 209,213</u>	<u>\$ 800,000</u>
Total Estimated Extramural	\$ 278,525	\$1,050,000

V. DISPOSITION OF WASTES

Minimal waste generated at the site and largely limited to disposal of 2 sludge boxes, site debris and PPE, and 4,000 gallons of fluids from 2 tankers. All waste has been shipped as non-hazardous.

VI. LESSONS LEARNED

Don't abandon large numbers of drums and totes.

**U.S. ENVIRONMENTAL PROTECTION AGENCY
REGION IV**

POLREP #5

Date: September 22, 2004

From: Robert N. Rosen
On-Scene Coordinator
USEPA Region IV

To: Regional Response Center
EPA HQ Regional Coordinator

I. GENERAL SITE INFORMATION

Site Name: Constitution Road Drum Site
Street address: 1235 Constitution Road
City, county, state, zip code: Atlanta, Dekalb County, Georgia 30316
NPL Status: non-NPL
Incident Category: emergency response
Status of Action Memorandum(a): ceiling increase action memo signed 8/16/2004
Start Date: July 9, 2004
Completion Date: July 31, 2005

II. BACKGROUND INFORMATION

See initial action memo/polrep

III. RESPONSE INFORMATION

- A. **Actions Taken:** ERRS contractors have now completed the staging of all drums and totes. Almost all available storage space at the site is now occupied by drums or totes. START contractors are now teamed with ERRS contractors and together continue the laborious process of logging drum labels and photos into a tracking database. By teaming the two contractor groups, we have increased the number of people logging this critical information. Logging is scheduled to be completed by late October.

Recent tropical storms brought significant rainfall. As a result, many drum and tote labels were impacted and critical information lost as the labels deteriorate. To help preserve labels ERRS has been tasked with covering drums with plastic sheeting and securing said sheeting with sandbags.

An ERRS chemist is now working on the site and is tasked with organizing the 700-800 small containers presently stored in the truck garage. The containers range in

size from 1 to 5 gallons capacity and also include miscellaneous bags of dry, bulk materials (such as lime). Once these materials have been segregated, ERRs will proceed with bulking and disposal. This process should be completed by the first week of October. The only other waste that will be disposed of in this phase of the removal is a miscellaneous aggregation of crushed drums, broken pallets, and other site debris. All other waste will be maintained on site in drums and totes until a PRP group can address identification and disposal.

- B. **Use of Innovative Technologies or Authorities:** On September 14, EPA and its contractors hosted a team from the Nuclear Filter Technology Company who were here to demonstrate a remote drum sampler and head-space analyzing tool. The instrument automatically perforates drums, inserts a sensor which performs headspace analysis, then obtains a sample for hazcatting. When the sensor is removed, it leaves a synthetic membrane seal over the sample perforation. The device works well on drums that contain a homogenous liquid (no phasing or layers) but is not capable of sensing or sampling layers. It also is not capable of pulling samples of non-liquids. At present, the instrument would not prove much benefit since many containers are either layered or contain solids.
- C. **Community Involvement:** None
- D. **Unusual Circumstances:** None
- E. **Future Considerations:** EPA Regional Counsel and the Cost Recovery program are investigating site ownership and reviewing manifests in order to develop a PRP list. It is our hope that by the time the site has been stabilized, we will be able to turn the site over to a PRP group for completion of the removal action.
- F. **Post Removal Site Control:** This issue will be addressed much later in the removal action and/or by the PRP group.

IV. CONTRACTOR INFORMATION AND ESTIMATED COSTS

- A. **Contractor Information:** EPA is utilizing ERRS and START contractors for this removal action.
- B. **Estimated Costs:**

	<u>Costs to Date</u>	<u>Current Ceiling</u>
START	\$ 102,341	\$ 250,000
ERRS	<u>\$ 263,829</u>	<u>\$ 800,000</u>
Total Estimated Extramural	\$ 366,170	\$1,050,000

**1. United States Environmental Protection Agency
Region 4
POLLUTION REPORT**

Date: Monday, October 18, 2004

From: Jeffery J. Crowley, OSC

Subject Sierra Chemical
: 2716 Noble Street, Anniston, AL

POLREP No.:	2	Site #:	A4FH
Reporting Period:	10/10/04-10/16/04	D.O. #:	0027
Start Date:	10/5/2004	Response Authority:	CERCLA
Mob Date:	10/5/2004	Response Type:	TC
Completion Date:		NPL Status:	Non NPL
CERCLIS ID #:	ALN010724001	Incident Category:	Removal Action
RCRIS ID #:		Contract #	68-S4-02-05

Site Description

Please refer to previous POLREP for background information.

Current Activities

The following actions were taken during the period of record:

-October 11, 2004: Members of ERRS continued to stage and sample drums and containers. The parking lot behind the building became too full to stage any more drums, so the drums were being lined around the inside of the facility. This was done to provide full access to the facility.

Smaller containers were staged in a small alcove adjacent to the building.

-October 12, 2004: Hazcatting began on the drums. In total, there are approximately 210 drums and 300 small containers that need to be hazcatted. All of the drums were staged and sampled during the reporting period. The START contractor and a member of ERRS continued to hazcat for the rest of the week, almost finishing the hazcatting for the drums.

-October 13, 2004: The OSC met with The Water Works and Sewer Board of the City of Anniston to see if they could determine where the floor drains in the building might empty. Upon inspection, the most likely outlet would be the sanitary sewer, however, the Board would like to do a dye test on the drains to be sure.

-October 14-15, 2004: Hazcatting continued on the drums. In addition, ERRS began to sample the smaller totes and containers.

Planned Removal Actions

The following activities are planned for the next reporting period:

- Continue to hazcat drums and smaller containers.
- Draw samples to send off for analytical analysis.
- Begin to request bids for disposal.
- Contact those vendors who have unopened drums at the facility to see if they will pick up their products.
- Begin to crush and cut empty drums and buckets for disposal.

Next Steps

After the drum removal and disposal, an investigation will begin on the floor drains inside the building to determine if there was any evidence that hazardous wastes were poured into them.

Key Issues

The key issue at the Site continues to be space. However, since the drums have been removed from the building this issue has become better. The situation will continue to improve once the hazardous wastes are bulked and drums crushed and everything is removed from site.

Estimated Costs *

	Budgeted	Total To Date	Remaining	% Remaining
Extramural Costs				
ERRS - Cleanup Contractor	\$210,000.00	\$59,887.01	\$150,112.99	71.48%
RST/START	\$20,000.00	\$5,836.69	\$14,163.31	70.82%
Intramural Costs				
USEPA - Direct (Region, HQ)	\$10,000.00	\$800.00	\$9,200.00	92.00%
Total Site Costs	\$240,000.00	\$66,523.70	\$173,476.30	72.28%

* The above accounting of expenditures is an estimate based on figures known to the OSC at the time this report was written. The OSC does not necessarily receive specific figures on final payments made to any contractor(s). Other financial data which the OSC must rely upon may not be entirely up-to-date. The cost accounting provided in this report does not necessarily represent an exact monetary figure which the government may include in any claim for cost recovery.

1. United States Environmental Protection Agency Region 4 POLLUTION REPORT

Date: Monday, October 18, 2004

From: Jeffery J. Crowley, OSC

Subject Sierra Chemical
: 2716 Noble Street, Anniston, AL

POLREP No.:	2	Site #:	A4FH
Reporting Period:	10/10/04-10/16/04	D.O. #:	0027
Start Date:	10/5/2004	Response Authority:	CERCLA
Mob Date:	10/5/2004	Response Type:	TC
Completion Date:		NPL Status:	Non NPL
CERCLIS ID #:	ALN010724001	Incident Category:	Removal Action
RCRIS ID #:		Contract #	68-S4-02-05

Site Description

Please refer to previous POLREP for background information.

Current Activities

The following actions were taken during the period of record:

-October 11, 2004: Members of ERRS continued to stage and sample drums and containers. The parking lot behind the building became too full to stage any more drums, so the drums were being lined around the inside of the facility. This was done to provide full access to the facility. Smaller containers were staged in a small alcove adjacent to the building.

-October 12, 2004: Hazcatting began on the drums. In total, there are approximately 210 drums and 300 small containers that need to be hazcatted. All of the drums were staged and sampled during the reporting period. The START contractor and a member of ERRS continued to hazcat for the rest of the week, almost finishing the hazcatting for the drums.

-October 13, 2004: The OSC met with The Water Works and Sewer Board of the City of Anniston to see if they could determine where the floor drains in the building might empty. Upon inspection, the most likely outlet would be the sanitary sewer, however, the Board would like to do a dye test on the drains to be sure.

-October 14-15, 2004: Hazcatting continued on the drums. In addition, ERRS began to sample the smaller totes and containers.

Planned Removal Actions

The following activities are planned for the next reporting period:

- Continue to hazcat drums and smaller containers.
- Draw samples to send off for analytical analysis.
- Begin to request bids for disposal.
- Contact those vendors who have unopened drums at the facility to see if they will pick up their products.
- Begin to crush and cut empty drums and buckets for disposal.

Next Steps

After the drum removal and disposal, an investigation will begin on the floor drains inside the building to determine if there was any evidence that hazardous wastes were poured into them.

Key Issues

The key issue at the Site continues to be space. However, since the drums have been removed from the building this issue has become better. The situation will continue to improve once the hazardous wastes are bulked and drums crushed and everything is removed from site.

Estimated Costs *

	Budgeted	Total To Date	Remaining	% Remaining
Extramural Costs				
ERRS - Cleanup Contractor	\$210,000.00	\$59,887.01	\$150,112.99	71.48%

RST/START	\$20,000.00	\$5,836.69	\$14,163.31	70.82%
Intramural Costs				
USEPA - Direct (Region, HQ)	\$10,000.00	\$800.00	\$9,200.00	92.00%
Total Site Costs	\$240,000.00	\$66,523.70	\$173,476.30	72.28%

* The above accounting of expenditures is an estimate based on figures known to the OSC at the time this report was written. The OSC does not necessarily receive specific figures on final payments made to any contractor(s). Other financial data which the OSC must rely upon may not be entirely up-to-date. The cost accounting provided in this report does not necessarily represent an exact monetary figure which the government may include in any claim for cost recovery.

U.S. ENVIRONMENTAL PROTECTION AGENCY REGION IV

POLREP #6

Date: October 20, 2004

From: Robert N. Rosen
On-Scene Coordinator
USEPA Region IV

To: Regional Response Center
EPA HQ Regional Coordinator

I. GENERAL SITE INFORMATION

Site Name: Constitution Road Drum Site
Street address: 1235 Constitution Road
City, county, state, zip code: Atlanta, Dekalb County, Georgia 30316
NPL Status: non-NPL
Incident Category: emergency response
Status of Action Memorandum(a): ceiling increase action memo signed 8/16/2004
Start Date: July 9, 2004
Completion Date: July 31, 2005

II. BACKGROUND INFORMATION

See initial action memo/polrep

III. RESPONSE INFORMATION

- A. **Actions Taken:** ERRS contractors have now completed the staging of all drums and totes. Almost all available storage space at the site is now occupied by drums or totes. START contractors are now teamed with ERRS contractors and together continue the laborious process of logging drum labels and photos into a tracking database. By teaming the two contractor groups, we have increased the number of people logging this critical information. Logging is still scheduled to be completed by late October but entry of all photos and final QA/QC of the data will continue through November.

An ERRS chemist is now working on the site and is tasked with organizing the 700-800 small containers presently stored in the truck garage. The containers range in size from 1 to 5 gallons capacity and also include miscellaneous bags of dry, bulk materials (such as lime). Once these materials have been segregated, ERRS will proceed with bulking and disposal. This process should be completed by the second week of October. ERRS has also been instructed to dispose of discarded tires that were spread throughout the site. The only other waste that will be disposed of in this phase of the removal is a miscellaneous aggregation of crushed drums, broken pallets, and other site debris. All other waste (drums and totes) will be maintained on site in drums and totes until a PRP group can address identification and disposal.

A number of roll-off containers of waste have been taken from the site for disposal, as well as the lead-acid batteries and the coming small container wastes described above. In all cases, the purpose in removing this waste has been two-fold: one purpose is to reduce the need to manage hundreds and hundreds of small containers (logging and hazcatting of containers) and to minimize the daily burden of assuring that containers are not leaking; the other purpose is to keep the site safe and as free of trash as possible. This reflects back on the concern over adequate space to manage and maintain the drums and totes. On one hand, it would have been preferable to keep all waste at the site until a PRP group could be tasked with the disposition of all site wastes, reducing EPA's overhead costs. On the other hand, the large volume of waste from empty drums, damaged pallets, garbage, sludge-filled roll-offs, liquid waste in the abandoned tank trucks, waste tires and hundreds of 1 and 5-gallon pails - all of this contributed to the overall waste management challenge as well as taking up space needed to stage drums and totes.

A final note on recent activities at the site: EPA's Criminal Investigation Division (CID) has representatives on site this week. They are using EPA staff from the Athens Environmental Lab to collect samples in support of an ongoing criminal investigation. During the process of identifying containers for (enforcement) sampling and analysis, an unmarked, 5-gallon pail was opened and found to contain two human fetuses. Each fetus was well-preserved in a sealed, glass jar which was filled with an unidentified liquid (probably a preservative). CID called in the Dekalb Police and Dekalb Medical Examiner. The Medical Examiner took photos then removed the pail and its contents and will evaluate whether further police investigation will be necessary.

- B. **Use of Innovative Technologies or Authorities:** On September 14, EPA and its contractors hosted a team from the Nuclear Filter Technology Company who were here

to demonstrate a remote drum sampler and head-space analyzing tool. The instrument automatically perforates drums, inserts a sensor which performs head space analysis, then obtains a sample for hazcatting. When the sensor is removed, it leaves a synthetic membrane seal over the sample perforation. The device works well on drums that contain a homogenous liquid (no phasing or layers) but is not capable of sensing or sampling layers. It also is not capable of pulling samples of non-liquids. At present, the instrument would not prove much benefit since many containers are either layered or contain solids.

C. **Community Involvement:** None

D. **Unusual Circumstances:** None

E. **Future Considerations:** EPA Regional Counsel and the Cost Recovery program are investigating site ownership and reviewing manifests in order to develop an initial PRP list. Their list will be compared to the generators on the START database to develop a PRP listing for further enforcement.

F. **Post Removal Site Control:** This issue will be addressed much later in the removal action and/or by the PRP group.

IV. **CONTRACTOR INFORMATION AND ESTIMATED COSTS**

A. **Contractor Information:** EPA is utilizing ERRS and START contractors for this removal action.

B. **Estimated Costs:**

	<u>Costs to Date</u>	<u>Current Ceiling</u>
START	\$ 160,000	\$ 250,000
ERRS	<u>\$ 364,000</u>	<u>\$ 800,000</u>
Total Estimated Extramural	\$ 524,000	\$1,050,000